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# LATHAM & WATKINS LLP

December 26, 2024

## VIA ECF

Honorable Michael E. Farbiarz, U.S.D.J.  
 Frank R. Lautenberg U.S. Post Office & Courthouse  
 2 Federal Square  
 Newark, New Jersey 07012

**Re: *In re Celgene Corp. Sec. Litig.*, Case No. 2:18-cv-04772-MEF-JBC**

Dear Judge Farbiarz:

We write on behalf of Defendants Celgene Corporation, Terrie Curran, and Philippe Martin (“Defendants”) to request a two-week extension, from December 26, 2024 to January 9, 2025, to file Defendants’ motion to seal materials filed with their reply brief in support of their Motion to Bifurcate Trial, Dkt. 358. The extension will allow Defendants to continue to confer in good faith with Plaintiff and other interested parties with the goal of either reducing or eliminating the amount of information Defendants seek to file under seal. Defendants have not previously sought an extension of this deadline. Plaintiff does not oppose the request. We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Kevin M. McDonough  
 Kevin M. McDonough  
 of LATHAM & WATKINS LLP

cc: All Counsel of Record (via ECF)

## **SO ORDERED**

s/James B. Clark, III  
 James B. Clark, III, USMJ

dated: 12/30/2024

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